

April 11, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, William L. Ball, Vice President Public Policy, submits this notice in the above-captioned proceedings of an ex parte meeting on April 11, 2003, with John Muleta, Chief, Wireless Telecommunications Bureau; and Jennifer Tomchin, Legal Advisor and Jared Carlson, Deputy Chief, Policy Division, both with the Wireless Telecommunications Bureau. The purpose of the meeting was to discuss the December 3, 2002 petition filed by OnStar in the above captioned docket.

OnStar's transition from analog to digital technology was discussed as well as the capabilities of the OnStar system to contact public safety answering points directly and through the OnStar call center. As a part of this discussion, it was noted that OnStar is currently a single transceiver, analog based service in which wireless calling is permitted only if the subscriber has first subscribed to the basic safety and security suite of services including the location-based emergency and automatic airbag deployment/crash notification services.

It was noted that analog is employed because that format permits voice and data to be transmitted on the same call. This capability is required in offering automatic airbag deployment

notification, emergency and other location-based services and that the challenge in transitioning to digital is developing a robust data transport.

It was noted that, as set out in the petition and reply comments, OnStar is not a portable unit or a conventional handset. In this regard, three issues were noted: the unique need of any telematics associated wireless calling Phase II solution to be interoperable across networks of all of a telematics service providers' wireless partners' networks; the need to reconcile the use of autonomous GPS with the use of Assisted GPS by CDMA carriers in developing their Phase II solutions; and the unique product lifecycle issues that occur because of telematics being embedded in the electrical architecture of a vehicle. OnStar suggested, as set forth in its pleadings, that collectively these and the location-based emergency and ACN telematics service capability differentiate its situation from the conventional handset around which the current E911 requirements were drafted. OnStar noted that the requested clarification was recommended to be limited to only certain embedded telematics configurations. OnStar also discussed the AFLT capability that it expects to be available when any digital 911 call is placed.

In response to questions about call volume, OnStar reviewed data submitted in its Reply Comments.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

William L. Ball
Vice President, Public Policy

OnStar Corporation
1400 Stephenson Highway
Troy, Michigan 48083-1189
248-588-2815

C: J. Carlson
J. Tomchin